

EXHIBIT K

KEEGAN ROBERTS

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DARCY M. BLACK,

Plaintiff,

-vs-

BUFFALO MEAT SERVICE, INC., doing business
as BOULEVARD BLACK ANGUS, also known as
BLACK ANGUS MEATS, also known as
BLACK ANGUS MEATS & SEAFOOD,
ROBERT SEIBERT,
DIANE SEIBERT,
KEEGAN ROBERTS,

Defendants.

Examination Before Trial of

KEEGAN ROBERTS, Defendant, taken pursuant to the Federal
Rules of Civil Procedure, in the law offices of GRECO
TRAPP, PLLC, 1700 Rand Building, 14 Lafayette Square,
Buffalo, New York, taken on January 12, 2018, commencing at
9:31 A.M., before MARY ANN MORETTA, Notary Public.

1 into the paper towel dispenser?

2 A. No.

3 Q. Why not?

4 A. Because I was interested in finding out why he
5 would call her kids niggers.

6 Q. Well, did you ask her if he was speaking directly
7 to her or to others -- her and others?

8 A. No, because she told me that he called her kids
9 niggers.

10 Q. Had you ever used anyone -- ever heard anyone use
11 the term nigger at Black Angus Meat?

12 A. No.

13 Q. Have you ever heard anyone use the term nigs at
14 Black Angus Meat?

15 A. No.

16 Q. Did you ever hear anyone use the term niggerima?

17 A. Yes. I watched The Hateful Eight the other day.

18 Q. Other than a movie?

19 A. I'm sure I've been to a sporting event and
20 somebody said something stupid somewhere.

21 Q. In the normal course of your life, have you heard
22 anyone use the term nigger?

23 MR. OPPENHEIMER: You used it a lot.